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14 Attorneys for the Creditor, SLC Soda Canyon, LLC

11 THE UNITED STATES BANKRUPTCY COURT  
12 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 **In re:**

) Case Nos. 19-30088 (DM)

15 **PG&E CORPORATION,**

) Chapter 11

16  
17 **-and-**

) **MOTION PURSUANT TO RULE**  
) **9006(b)(1) of THE FEDERAL RULES OF**  
) **BANKRUPTCY PROCEDURE TO**  
) **ENLARGE TIME TO FILE A PROOF OF**  
) **CLAIM**

18 **In re:**

19 **PACIFIC GAS AND ELECTRIC**  
20 **COMPANY,**

) DATE: March 9, 2020  
) TIME: 10:00 a.m.  
) PLACE: Courtroom 17  
) 450 Golden Gate Avenue,  
) 16<sup>th</sup> Floor,  
) San Francisco, California

21 Debtors.

- 22 ☐ Affects PG&E Corporation  
23 ☐ Affects Pacific Gas and Electric  
24 ☒ Affects both Debtors

) JUDGE: Hon. Dennis Montali

) **OBJECTION DEADLINE: February 23, 2021**  
) **(4:00 P.M. Prevailing Pacific Time)**

26 *\* All papers shall be filed in the lead case, No.*  
27 *19-30088(DM)*  
28

1           **TO: DEBTORS; THE TRUSTEE OF THE FIRE VICTIM'S TRUST; THE UNITED**  
2 **STATES TRUSTEE; CREDITORS; OTHER PARTIES IN INTEREST; AND THEIR**  
3 **RESPECTIVE ATTORNEYS OF RECORD:**  
4

5           Creditor, SLC Soda Canyon, LLC ("Soda Canyon LLC"), by and through its attorneys of  
6 record, respectfully submits this Motion Pursuant to Rule 9006(b)(1) of the Federal Rules of  
7 Bankruptcy Procedure to Enlarge Time to File a Proof of Claim (hereinafter referred to as the  
8 "Motion")  
9

10           The Motion seeks the entry of an order enlarging time for Soda Canyon LLC to file a Proof of  
11 Claim in the above-captioned bankruptcy cases. The Motion further seeks entry of an order deeming  
12 the Proof of Claim, claim number 106942, filed by Soda Canyon LLC on February 4, 2021, which is  
13 attached as **Exhibit 5** to the *Declaration of Sean Erik Hoel*, filed concurrently herewith, as being  
14 timely filed. It is respectfully submitted that the Motion be granted for the reasons set forth within  
15 the *Memorandum of Points and Authorities*, filed concurrently herewith.  
16  
17

18 Dated: February 9, 2021

Respectfully submitted,

19 **PINO & ASSOCIATES**

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21  
22 By: \_\_\_\_\_

23 Estela O. Pino, Attorneys for  
24 SLC Soda Canyon, LLC.  
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